

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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DISTRICT COURT
DISTRICT OF MASS

DEBORAH CHIN, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., HASSAN
AHMED, and STEPHEN NILL,

Defendants.

Case No.: C-04-10294-DPW

Class Action

This Document Relates To:

ALL RELATED ACTIONS.

**BPI GLOBAL ASSET MANAGEMENT LLP'S
NOTICE OF MOTION AND MOTION FOR LEAVE
TO MANUALLY FILE PAPERS WITH THE COURT**

TO ALL INTERESTED PARTIES AND THEIR COUNSEL OF RECORD:

Proposed Lead Plaintiff BPI Global Asset Management LLP ("BPI Global"), by its counsel, hereby respectfully moves this Court for leave to manually file documents with the Court until its counsel's registration as a CM/ECF user is completed.

This motion is made on grounds that good cause exists for permitting manual filings. Counsel for BPI Global has electronically submitted its registration information to the Court, and that information was successfully received by the Court. However, Counsel for BPI Global is informed that its registration may not be activated for up to two weeks, during which time filings will need to be made with the Court.

In support of this motion, BPI Global Asset Management LLP submits herewith a memorandum of law, the Declaration of Patricia A. Szumowski, and a [Proposed] Order.

DATED: April 23, 2004

Respectfully submitted,

GRAHAM & ALBANO, P.C.

By: Patricia Szumowski/arg

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